

STATE OF COLORADO

Roy Romer, Governor
Patti Shwayder, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION
<http://www.cdphe.state.co.us/hm/>

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Denver, Colorado 80246-1530 Grand Junction, Colorado 81501-2768
Phone (303) 692-3300 Phone (303) 248-7164
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**Colorado Department
of Public Health
and Environment**

December 31, 1997

Karan North
Kaiser-Hill Company, L.L.C
Rocky Flats Environmental Technology Site
P.O. Box 464
Golden, Colorado 80402-0464

**RE: Close-Out of the November 19 & November 20th Inspection of Building 444 EPA
Identification Number CO7890011526**

Dear Ms. North:

On November 19 & 20th, 1997, inspectors from the Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), conducted a routine compliance evaluation inspection of Building 444 and surrounding support buildings. The Division received and reviewed your response to that inspection, dated December 3, 1997. Based upon our review of your response, all issues identified during the referenced inspection have been resolved to the satisfaction of the Division. Therefore, the Division does not intend to take any further action in response to that inspection.

The Division appreciates your timely and complete response to the issues identified during the November 19 & 20th inspection. Please contact Cynthia Silva Burbach of my staff at (303) 692-3315 if you have any questions regarding this memorandum or the close-out of the inspection.

Sincerely,

Joe Schieffelin, Unit Leader
Federal Facilities Permitting and Compliance
Hazardous Materials & Waste Management Division

cc: w/attach

cc: w/o attach

Bob April, DOE-RFFO
Gary Konwinski, RMRS

Janice Pierson, EPA
John Wrapp, K-H

Best Available Copy

ADMIN RECCRD

IA-A-000456

Y15

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

EPA I.D. #CO7890010526

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

HAZARDOUS WASTE INSPECTION REPORT

DATE OF INSPECTION: November 19 & November 20th, 1997

FACILITY: Rocky Flats Environmental Technology Site-US DOE,
Building 444

LOCATION: 16 Miles NW of Denver
Golden, Co 80402

FACILITY REP: Gary Konwinski

TELEPHONE: 303-966-2729

NOTIFICATION STATUS: Large Quantity Generator
Land Disposal Facility

TYPE OF INSPECTION: Compliance Evaluation, Partial

PARTICIPANTS: Cynthia Silva Burbach, CDPHE
Edward Smith, CDPHE
James Hindman, CDPHE
Joe Schieffelin, CDPHE
Gary Konwinski, RMRS
Celia Moynihan, RMRS
Cathy Alstatt, P/E-K/H
Karan North, KH
Dave Martin, RMRS

WEATHER CONDITIONS: Sunny and Cold

TIME IN: 8:15 am November 19, 1997

TIME OUT: 2:15 pm November 20, 1997

INTRODUCTION

On the morning of November 19, 1997, inspectors Cynthia Silva Burbach, James Hindman, Edward Smith and Joe Schieffelin from the Federal Facilities Unit of the Hazardous Materials and Waste Management Division (the Division) arrived at Building 444 at Rocky Flats Environmental Technology Site. The inspectors were there to conduct a partial compliance evaluation of Building 444 and support buildings (445, 447, 448, 449, 450 and 439 annex), focusing on waste chemicals as identified under Compliance Order on Consent #97-08-21-02. Attachment one provides a list of the people that were present at the opening conference. Dave Martin and Celia Moynihan of Rocky Mountain Remedial Services (RMRS) were the facility point of contacts and escorted Division inspectors through Building 444.

Building 444 is located in the southwestern portion of the Rocky Flats Environmental Technology Site. This building contains a partial basement, a main floor and mezzanine in the eastern portion of the building and only a main floor in the western portion of the building.

The production operations in Building 444 were conducted to support War Reserve, special order and manufacturing development work. Building 444 was one of the first buildings constructed on plant site and was built for the purpose of casting, fabricating and machining depleted uranium components. In 1957 Building 445 was added as a support building to building 444. When fully operational Beryllium machining operations took place in Building 445. These machining operations included: sawing, milling, drilling, and lathe work, followed by polishing and abrading operations on Be castings, rough pressings, and bar stock. Building 447 was constructed in 1956 and served as a manufacturing building. Building 448 was added on in 1962 and was used as a shipping, receiving, and storage building. Building 450 was constructed to house the exhaust filter plenum and exhaust fans that handle a major portion of the air exhausted from Building 444. Building 449 annex includes a former paint booth and a Carpentry Shop. The paint booth area now stores miscellaneous construction materials. Building 439 is currently being used for maintenance operations. As of March 1994, the majority of the operations ceased in Building 444. During the November 1997 inspection Building 444 was working towards closure. Facility representatives informed the inspectors that the only operations being conducted are maintenance operations.

OPERATIONS INSPECTED ON NOVEMBER 19, 1997

Accompanied by facility representatives, Division inspectors observed all but a few select rooms of Building 444 and surrounding support buildings. The areas that were excluded from the tour were rooms that have Asbestos Contamination, Beryllium Contamination, or were High Airborne Radioactivity Areas. These areas may contain waste chemicals, but are excluded from in the Waste Chemical Plan. They are excluded due to the risk that is posed to worker safety. The following is a summary of the areas that were evaluated during the inspection.

ROOM 204

This room is located upstairs in Building 444. The lighting in this area was very poor and flashlights were necessary to inspect. To the right and inside the door was a metal tool crib, which contained miscellaneous construction debris. In a metal cabinet inside the tool crib the inspectors found a container of Botts Ink which did not contain a Integrated Chemical Management System (ICMS) number. Because some inks are hazardous the inspectors asked facility representatives if they had information pertaining to the use of this chemical. They stated that they were unsure as to its use, and did not know if it was hazardous. Celia Moynihan of RMRS removed the containers from the caged area to cabinet #7, RCRA 90 day unit.

The inspectors proceeded to the ninety day area in room #201. This area contained two yellow flammable cabinets which serve as the ninety day storage area. There were also numerous fluorescent tubes in this area on a cart. This area also contained various other non-hazardous excess chemicals such as: mucilage (glue), leak tec, and one 500 gram bottle of Molybdenum Disulphide powder stored within a grey flammable cabinet. This area formerly contained thousands of waste chemicals which were stored in numerous metal file cabinets. They have since been removed during the waste chemical roundup of Building 444. The inspectors observed approximately 40 small vials in a desk drawer in this room. Some of the vials contained small parts with liquid and some had powder. Facility representatives did not know the contents of the vials or their former use. The liquid was thought to be alcohol which may be ignitable. Those vials were taken to the 90-day area.

ROOM #201

Outside the caged area and to the left was one unmarked grey 55 gallon drum. This drum did not contain a WEMS number nor was it labeled with the words hazardous waste or non-hazardous materials. There was however a MSDS on top of the drum, which included information indicating Mike Simmons of MSC generated the contents of the drum. Facility representatives were unsure why the drum did not contain a WEMS number. Upon further investigation Mike Simmons stated to the inspectors that he was not the owner of the drum found in room 204 in Building 444. Inspectors asked facility representatives to further investigate the contents of the drum.

ROOM #245B

This room contained various office furniture and miscellaneous equipment. In one of the desk drawers in this room the inspectors found one small Mercury light bulb. A label on the lamp said caution: Mercury Dispose Of In Ecological Manner. Since there is no work being performed in Building 444 other than maintenance activities the inspectors questioned whether the bulb could be re-used. Facility representatives placed the bulb in the ninety day area during the inspection.

ROOM #245

This area was the former plating laboratory. In several drawers were hydrometers and miscellaneous laboratory equipment. There was also several tool boxes placed within this area. One tool box in particular contained about fourteen used mercury thermometers. Facility representatives stated that the thermometers were to be transferred to the Los Alamos DOE site to be re-used in the laboratory there. The inspectors requested documentation regarding this DOE transfer.

ROOMS #203, #205, #212B

These areas contained former offices, laboratories, and the vol rath vats, which hold sludge. The inspectors found no issues in room #212B. There were several circuit boards in the office area of #205A. Facility representatives stated that they were rounding them up to be placed in one central area. Room #203 contained several empty desk and miscellaneous office equipment. Room #205 contained three vats that were used in the salt etching process. The waste from these vats did contain an ICMS number (21395) and was clearly labeled. Dave Martin from RMRS stated that the waste was non-hazardous.

THE BASEMENT

ROOM #11 and #3

The inspectors observed an open five gallon bucket of Huntington material, which contained ICMS (0000202521), and a small can of Wakefield Thermal Compound (ICMS 0000039144). The inspectors questioned whether the Huntington and the Wakefield Compound was waste or product. Facility representatives stated that they were unsure and that they would further investigate the use of these materials.

ROOM #8 (Utility Room)

This room is an asbestos contaminated area and excluded in the Waste Chemical Plan. Due to risk posed by the contamination the inspectors did not enter this area. The inspectors were able to view the room through the window on the door. The room had several waste chemicals that appeared to be in good condition and several looked brand new. This room is visually observed weekly as part of the Waste Chemical management order.

ROOM #7

This room contained a Do All Grinder Model 210 (property #00013170-00). The grinder still contained a small amount of oil at the time of the inspection. Inspectors could not find this grinder on the Idle Equipment inventory. The inspectors also found a Lead weight, and a roll of solder, both of which are hazardous waste. Facility representatives removed these two

items, and placed them in the 90 day area.

ROOM #1

This area contained RCRA Unit #2412. The inspectors questioned whether the Satellite Accumulation Point was still accumulating hazardous waste for the hazardous filters removed from the waste system canister filter. At the time of the inspection facility representatives stated that the waste stream for Satellite Accumulation Point was no longer being generated.

ROOM #13

In a flammable cabinet directly to the left inside this room was a can of Rycon #2 with no ICMS number. The Rycon #2 appeared to be a waste chemical. Facility representatives stated that they were unsure as to the use of this product and would further investigate. This area also included miscellaneous construction tools and debris. There was also a glove box within this room that contained a small plastic bottle, which appeared to have liquid. The glovebox was padlocked to prevent entry. Facility representative Dave Martin was able to cut the lock off so that inspectors could view the contents of the bottle. The plastic bottle was empty.

HIGHBAY AREA

The inspectors found one 55 gallon drum of used oil mixed with groundwater, which was not labeled with the words "USED OIL". Facility representatives stated that they would label the drum immediately. The inspectors also observed one cylinder against the wall in the highbay area. It's contents were unknown, and the container was very battered. In the High Bay area were three grey file cabinets that were labeled empty. Upon opening the cabinets the inspectors observed numerous waste chemicals. Facility representatives stated that the chemicals were all non-hazardous. The chemicals were stored properly and in a safe configuration. The inspectors did express their concerns about the lack of ICMS numbers on a few of the chemicals.

BUILDING #448

ROOM #601 AND ROOM #404

The inspectors observed one small container of Sodium Bicarbonate that did not contain a ICMS number. Although the bicarbonate appeared to be in the original container it did not contain a ICMS number that confirms that the facility has knowledge of the chemical and is aware if it has been determined that the chemical has a future use. In the back room of this area was one empty gas cylinder of Argon. This cylinder appeared to have no future use, and should of been part of the waste chemical roundup, which has been completed in Building 444. This area also contained numerous janitorial supplies, which are not part of the Chemical Management Order. The inspectors also observed three empty gas cylinders labeled

Helium in room #404. The inspectors asked facility representatives to explain the future use of all non-maintenance gas cylinders in Building 444 and surrounding support buildings. Across from room 404 the inspectors notice one tube of waste chemical labeled Permatex without an ICMS number. Facility representatives indicated that they would find out if this material is still be utilized in the building.

OPERATIONS INSPECTED NOVEMBER 20, 1997

BUILDING 449 ANNEX

This annex is still in use for maintenance operations. The inspectors observed several lead bricks stacked in the middle of the floor. Facility representatives stated that the bricks were used for shielding, and was pre-atomic aged lead. The inspectors also observed approximately fifteen spent fluorescent light bulbs in the maintenance area. These bulbs were not managed in accordance with the Satellite Accumulation or 90-day regulations. The facility placed the light tubes in a 90-day during the inspection.

FLAMMABLE CABINET OUTSIDE OF BUILDING 449

The inspectors observed a one gallon can in a flammable cabinet located outside and north of Building 449. The can was unmarked and unlabeled. Facility representatives stated that they would investigate and identify the contents of the can.

BUILDING 445

ROOM #700

The inspectors found one 55 gallon drum of used oil, which was not labeled with the words "USED OIL". Facility representatives labeled the drum during the inspection.

ROOM #700 D

The inspectors observed three RMRS employees surveying spent fluorescent light bulbs in the 90-day area. The inspectors were concerned that if a spent bulb was to be broken during the radiological survey, would the employees have enough knowledge about hazardous waste to ensure that the broken bulb was managed properly. At the time of the inspection the facility did not know the extent of these employee's training.

FLAMMABLE CABINETS SOUTHEAST OF BUILDING 444

The inspectors observed 12-five gallon cans of wood penetrant in a flammable cabinet outside of Building 444. The cans were unopened and appeared to be product. The inspectors

observed no ICMS on any of the cans. Facility representatives stated that they would place a bar code on each container by the end of the day.

BUILDING 444 ROOM #101

No issues identified

BUILDING 447 ROOM #501

The inspectors observed one empty and one broken aerosol can in this area (WD-40 and spray paint), which had broken tops. Facility representatives provided documentation that all empty aerosol cans are being transferred to Building 881, and managed as Universal Waste.

DOCUMENTS REVIEWED

The following documents were reviewed following the physical inspection..

1. MSDS for Dykem Steel found in room #201 of Building 444.
2. Satellite Accumulation area weekly log sheets for Building 444 room #1. No issues were identified.
3. MSDS for the grey 55 gallon drum found in room #204 of Building 444.
4. Training records for the following personnel: Kimberly Oman, John Martinez, James Ross and Judy Yeater.
5. Property/Waste Release Evaluation for aerosol cans in Building 444.
6. Waste and Environmental Management System (WEMS) reports for the following container number: W07360044403628.
7. ICMS reports for the following bar coded chemicals: 000020251, 0000039144, 0000326152, 0000314064, 0000320580. No issues were identified.

INSPECTION CLOSEOUT FINDINGS

As a result of the inspection, eight issues were identified and related to facility representatives during the inspection close-out on November 20, 1997. Lead inspector Burbach requested a written response by December 3, 1997.

1. The inspectors observed fifteen spent fluorescent light bulbs in Building 449 annex that were not managed in accordance with the Satellite Accumulation or 90 day area

regulations. Facility representatives placed the fluorescent light bulbs in a 90-day area in Building 444 during the inspection.

2. The inspectors observed two drums of used oil (room #700 of Bldg 445 and the HighBay area) which were not labeled with the words "USED OIL". Facility representatives labeled the drums immediately and appropriately during the inspection.
3. The inspectors asked facility representatives to move the 55 gallon drum in RCRA Unit 2412 to a 90-day or to permitted storage within 24 hours. Through information received during the inspection the inspectors believed that the waste stream for this satellite was no longer being generated. Facility representatives stated that RCRA Unit 2412 contains the filter socks from the process waste canister filter. At the time of this inspection the facility was awaiting analytical results to confirm if the filters were hazardous or non-hazardous.
4. The inspectors requested documentation in the form of a Department of Energy Requisition for the mercury thermometers in the plating laboratory. The facility provided a letter from Mike Brooks of Los Alamos National Laboratory requesting thermometers from Building 444.
5. The inspectors asked for a waste determination for the following items found during the inspection: one Mercury bulb, several empty gas cylinders found throughout Building 444 and it's support buildings, Rycon #2 in room #13, two half-pint containers of Dykem Steel Blue dated 2/16/77, 40 small vials filled with liquid and parts in room #201, one five gallon bucket of Huntington material in room #11, one small can of Wakefield Thermal Compound, and one tube of Permatex across from room #404. The facility stated that the mercury vapor light bulb was to be moved and stored with other replacement light bulbs, the gas cylinders which are not needed will be sent to the gas house on site, the Rycon #2 is product and is still being used, The Dykem Steel Blue is no longer being used and was placed in a 90-day area, the liquid from the forty vials found in room #202 was discarded down the process waste drain, the five gallon bucket of Huntington material is still routinely used, one small can of Wakefield Thermal compound is also still used by maintenance and the one tube of Permatex is a sealant used by maintenance and will be placed on a maintenance cart.
6. The inspectors asked the facility representatives to ensure that all products are bar coded or managed as waste. It makes it very difficult during an inspection to identify if a chemical is still being utilized when it does not contain an ICMS number, and the facility can't readily identify the use of the substance. Although some chemicals are in their original containers, some are not making identification difficult. The facility representatives responded by bar coding the following products during the inspection: twelve-15 gallon cans of wood penetrant, and one 250 ml bottle of Sodium bicarbonate. The one gallon metal can in the flammable cabinet 19 near Building 449 was being used as secondary containment and therefore was not labeled.

7. The inspectors requested the hazardous waste training records for the three employees observed surveying spent fluorescent light bulbs in the 90-day area in Building 445 room #700- D. Through review the inspectors identified that the three employees surveying spent light bulbs in the 90-day area were lacking hazardous waste training. The Inspectors are concerned that if a spent bulb was to be broken during the radiological survey, these employees may not have enough hazardous waste knowledge to ensure that the spent light bulbs were disposed of properly. The facility responded by assuring the inspectors that General Employee Training (GET) for the employees surveying spent bulbs will be amended to include a session. associated with the identification of hazardous materials and emergency response protocol.
8. The inspectors requested information on the unmarked 55 gallon grey drum observed in room #204 of Building 444. This drum did not contain a WEMS number, but did contain several Material Safety Data Sheets and paperwork identifying the generator as Mike Simmons of MSC. Correspondence with Mr. Simmons revealed that he did not have any container under his ownership left in Building 444, therefore the inspectors wanted more detailed information on the actual contents of this drum. The facility re-packed the drum on the day of the inspection to confirm the contents, and assigned a WEMS number to the container. The drum was non-hazardous low-level waste.

ATTACHMENTS

1. One NOI
2. RMRS response to NOI
3. Correspondence from Mike Brooks of Los Alamos Laboratories dated 9/24/97
4. One inspection attendance list
5. Property/Waste Release Evaluation Form dated 11/29/97
6. One inspection Log Sheet from the Satellite Accumulation Area in room #1, Bldg. 444
7. One MSDS for Rust-Oleum
8. MSDS for the grey drum found in room #204, Bldg. 444
9. MSDS for Dykem Steel Blue
- 11 Twenty Two photographs

SIGNATURE BLOCK

Prepared by: Cynthia Silva Burbach
Cynthia Silva Burbach

Date 12/30/97

Reviewed by: Edward H. Smith
Edward H. Smith

Date 12/30/97

Approved by: Joe Schieffelin
Joe Schieffelin

Date 12/29/97

ATTACHMENTS

1 of 3

Notice of Inspection

Facility Name <u>Rocky Flats Environmental Technology Site</u>			EPA I.D. # <u>CO 759 0010526</u>	Date <u>11/19/97</u> <u>11/20/97</u>
Street <u>P.O. Box 928</u>			Telephone # <u>906-7000</u>	Seq. #
City <u>Golden</u>	County <u>Jeffco</u>	Zip <u>80402</u>	Inspection Arranged Prior to Inspection (<input checked="" type="checkbox"/> Yes) () No	Hour In: <u>8:15 am</u> <u>11/19/97</u>
Facility Representatives and Titles <u>GARY KONWINSKI, PMRS ENV. MGR</u>			Enter By: (<input checked="" type="checkbox"/> Consent) () Warrant	Hour Out: <u>2:15 pm</u>
			Agency: (<input checked="" type="checkbox"/> State) () Oversight () Joint	
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or Other _____ If Status Changed, Facility Should Revise Notification				

COMMENTS:

- ① Failure to manage Fluorescent light bulbs in accordance with the Satellite Accumulation or 90-Day Regulations 262.34
- ② Failure to mark two drums of used with the words "Used Oil" 279.22(c) ^{hazardous waste}
- ③ Within 24 hrs move the drum in RCRA unit 2412 to 90-day or permitted storage. The waste stream for this SAP is no longer being generated. ^{or provide documentation that this SAP is still in use.} 14 c5b
- ④ Provide documentations within 7-Days in the form of DOE requisitions for the following items that is claimed to be re-useable: mercury thermometers in the plating area.

Compliance Assistance: ☐ Compliance Information ☐ Referral to Compliance Assistance ☐ Pollution Prevention ☐ Field Assistance

Samples, Documents, Plans, and/or Photos Collected	4.
1. <u>MSDS's for Dykem Steel</u>	5.
2. <u>Blue & grey drum in room</u>	6.
3. <u>#204</u>	7.

Samples requested and received by facility: () Yes () No If Yes: () Duplicate () Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Gary Konwinski 11-20-97
Signature of Facility Representative

Lead Inspector: Lindy Burbach

Assisting Inspector(s) and Multimedia Participant(s):

James Hundman

Ed Smith

2 of 3

(303) 692-3300

Facility Name Rocky Flats Env. Tech. Site		EPA I.D. # C07890010526	Date
Street PO BOX 928		Telephone # 966-7000	Seq. # N/A
City Golden	County Jefferson	Zip 80402	Inspection Arranged Prior to Inspection <input checked="" type="checkbox"/> Yes () No
Facility Representatives and Titles GARY R. KONWINSKI, ENV. MGR			Hour In: 8:15 am
Enter By: <input checked="" type="checkbox"/> Consent () Warrant			Hour Out: 2:15 pm
Agency: <input checked="" type="checkbox"/> State () Oversight () Joint			
NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or <input type="checkbox"/> Other _____			
If Status Changed, Facility Should Revise Notification			

COMMENTS:

COMMENTS:
 (5) Provide a determination as to whether the following items are waste or product: The mercury bulb found in the desk drawer of the plating area, the misc gas cylinders found throughout the C.A. and machine shop, Rycon #2 Dykem Steel Blue, ~40 small vial: #13 in room, 2 1/2 pint containers in room #201 dated 2/16/1977

5 gallon bucket of Huntington material in room #11 (ICMS 00000 202521)) Small called Wakefield can thermal (ICMS 00000 39144) compound

one tube of Permatest
in^{re} room across from # 404

in room across from 404

⑥ Ensure all products are barcoded or managed as waste, ~~to be~~ with several items throughout The inspection were found ~~to be~~ with ICMS numbers

Compliance Assistance: _____ Compliance Information _____ Referral to Compliance Assistance _____ Pollution Prevention _____ Field Assistance _____

Compliance Assistance: Compliance Information Referral to Compliance Assistance Pollution Prevention Field Assistance

Samples, Documents, Plans, and / or Photos Collected	4.
1.	5.
2.	6.
3.	7.

Samples requested and received by facility: ☐ Yes ☐ No If Yes: ☐ Duplicate ☐ Split

The facts established by this inspection will be reviewed by State personnel. A final determination of your facility's compliance with State Regulations will be made as a result of this review. The review may reveal additional violations.

Receipt of this Notice of Inspection Form is Acknowledged

Sam R. Kunitz 11-20-97
Signature of Facility Representative

Lead Inspector: Cindy Burbach

Assisting Inspector(s) and Multimedia Participant(s):

James Hindman

Ed Smith

**Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division**

4300 Cherry Creek Drive South, Mail Code: HMWMD-CP-B2, Denver, CO 80222

(303) 692-3300

383

Notice of Inspection

Facility Name: <u>Rocky Flats Env. Tech Site</u>			EPA I.D. #: <u>CO7890010526</u>	Date: <u>11/20/97</u>
Street: <u>P.O. Box 928</u>			Telephone #: <u>966-7000</u>	Seq. #: <u>N/A</u>
City: <u>Golden</u>	County: <u>Jeffco</u>	Zip: <u>80402</u>	Inspection Arranged Prior to Inspection () Yes () No	Hour In: <u>8:15 am</u>
Facility Representatives and Titles: <u>GARY R. KONWINSKI, ENV. MGR</u>			Enter By: <input checked="" type="checkbox"/> Consent () Warrant	Hour Out: <u>2:15 pm</u>
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NOTIFICATION(S): <input checked="" type="checkbox"/> LQG, <input type="checkbox"/> SQG, <input type="checkbox"/> Exempt, <input checked="" type="checkbox"/> LDF, <input type="checkbox"/> TSF, <input type="checkbox"/> Transporter, <input type="checkbox"/> Non-Notifier, or <input type="checkbox"/> Other _____ If Status Changed, Facility Should Revise Notification				

COMMENTS: 5 gallon

- ⑥ 12 cans ~~in~~ in flammable cabinet (^{SE} outside) of Bldg 444 labeled wood penetrant were not bar coded, along with the Sodium Bicarbonate in Bldg 448, 1 gallon metal can in flammable cabinet 19 located outside and north of Building 449 (unlabeled & unmarked).
- ⑦ Provide TSR's for the 3 employees working in the 90-Day area managing hazardous waste.
- ⑧ Provide information regarding the grey drum in Room #204 (It has no WEMS # or label).

Compliance Assistance: ☐ Compliance Information ☐ Referral to Compliance Assistance ☐ Pollution Prevention ☐ Field Assistance

Samples, Documents, Plans, and / or Photos Collected	4.
1.	5.
2.	6.
3.	7.

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Gary R. Konwinski 11-20-97
Signature of Facility Representative

Lead Inspector:

Assisting Inspector(s) and Multimedia Participant(s):
